



Pennsylvania Department of Environmental Protection

Armbrust Professional Center
RR #2, Box 603-C
Greensburg, PA 15601-8739

February 25, 1998

Greensburg District Office

724-925-5400

NOTICE OF VIOLATION

CERTIFIED MAIL NO. Z 369 603 298

Koppers Industries, Inc.
345 Donner Avenue
Monessen, PA 15062

ATTENTION: Gregory Shamitko
Director of Environmental Affairs

Re: RCRA Inspection
Monessen Coke Plant
PAD982577082

Dear Mr. Shamitko:

A Resource Conservation Recovery Act (RCRA) inspection of the subject facility was made on February 18, 1998. Regulations which are equal to or more stringent than the EPA's have been passed by Pennsylvania and are found in Act 97 "Pennsylvania Solid Waste Management Act," the Act of July 7, 1980, P.L. 380 No. 97, 35 P.S. §6018.101 et. seq. and the rules and regulations promulgated thereunder. This letter is to notify you of the violations that were noted at the time of the inspection:

1. A blue colored sludge material was observed spilled on the ground adjacent to the east wall of ore yard #3. This is a violation of Section 610(1) of the Solid Waste Management Act (Act 97).
2. Sludge from the columnar oxidation plant ("colox") that was reported to have been recycled onto the coal during previous inspections, was found deposited on the ground outside its storage area.

The sludge was observed to be washing off-site into the Monongahela River in the vicinity of Outfall 001. The colox sludge was also observed deposited onto the access road along the riverside of the plant for a distance estimated at 100 feet. Allowing the colox sludge to be deposited onto the ground and washed into the Monongahela River is a violation of 25 Pa. Code Chapter 299.111(4), Sections 302(a) and 610(1) of Act 97, as well as Section 307(a) of the Clean Streams Law.



3. Failure to prevent the disposal of the colox sludge by water erosion is a violation of 25 Pa. Code Chapter 299.131(a).
4. Failure to maintain berms around the storage area for the colox sludge is a violation of 25 Pa. Code Chapter 299.131(d).
5. In order to maintain the Permit by Rule (PBR) status for the beneficial use of colox sludge as an amendment to the coal for coking, the following requirements should be met:
 - (a) A chemical analysis of the sludge should be performed as required by 25 Pa. Code Chapter 287.102(b)(4) and (5), which includes an evaluation of the colox sludges BTUs per pound.
 - (b) Daily records of the weight/volume of colox sludge being processed and reused should be kept as required in 25 Pa. Code Chapter 287.102(a)(3)(ii).
6. The containment area for the storage of coal tar decanter sludge, ammonia steel sludge, and other wastes being recycled onto the coal is not being properly maintained. No system has been set up to remove spilled or leaked waste or accumulated precipitation as required by 25 Pa. Code Chapter 264.175(a)(2) and 264.175(c).
7. Weekly inspections of the hazardous waste storage areas are not being performed as required by 25 Pa. Code Chapter 264.174.

A reinspection of the facility will be conducted on or about April 3, 1998 to determine if the above listed items have been corrected. Failure to comply could result in legal action being taken against you.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore to hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions, contact me at the above number.

Sincerely,

A handwritten signature in cursive script, reading "David L. Leiford".

David L. Leiford
Waste Management Specialist
Waste Management

cc: Pittsburgh Regional File
EPA
Bureau of Water Management
County
Chron

DLL:jao

RCRIS UNIVERSE MAINTENANCE FORM

EPA ID P A 2 9 8 2 5 7 7 0 8 2

Facility Name MONESSEN INC / SHARON STEEL CORP

Source: N A ☒ S ☐ E

Notification Date 1/4/96

Waste Activity	Type	RCRA Reg Status	RCRA Reg Description
Generator	1	N	7
Transporter	_____	_____	_____
TSD	_____	_____	_____
Burner	_____	_____	_____
HWF Market to Blender _____		HWF Other Market _____	HWF Burner _____
OSO Market to Burner _____		OSO Other Market _____	OSO Burner _____
SO ACT:			
Burner Type: Utility Boiler _____		Industrial Boiler _____	Furnace _____
Underground Injection Control:			
Recycler:			
Mode of Transportation: Air _____ Rail _____ Highway _____ Water _____			
Other _____			

CW
3/11/96

Process Code Information
Source E or S (circle correct one)

PROCESS CDE/SEQ	COMM AVAIL	AMT TYPE	STATUS	AMOUNT	UOM	NO. OF UNITS	REPORT DATE
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____

<input checked="" type="checkbox"/> IR inspection report	_____ Affidavit from the facility
_____ Revised Notification from the state	_____ Affidavit from the state
_____ Revised Notification from the facility	_____ Biennial report
_____ EPA clean closure certificate	_____ Documentation not required
_____ State documentation certifying clean closure	
_____ Other	
<p>Date to Data Entry <u>224</u></p> <p>Batch Number <u>MAR 19 1996</u></p> <p>Date QAd _____</p>	



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PAD982577082

10/25/95

INSTALLATION ADDRESS

KOPPERS INDS MONESSEN
345 DONNER AVE
MONESSEN, PA 150620510
JIM BURKHART PLT MANAGER

345 DONNER AVE
MONESSEN, PA 150620510

EPA Form 8700-12A (6-90)

GEN



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EPA I.D. NUMBER

PAD982577082

10/02/95

INSTALLATION ADDRESS

KOPPERS INDS MONESSEN
345 DONNER AVE
MONESSEN, PA 150620510
JIM BURKHART PLT MANAGER

345 DONNER AVE
MONESSEN, PA 150620510

EPA Form 8700-12A (6-90)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
- Please note our new name -
DEPARTMENT OF ENVIRONMENTAL PROTECTION
D E P

RR #2, Box 603-C
Greensburg, PA 15601-9802

September 26, 1995

Greensburg District Office

(412) 925-5400

NOTICE OF VIOLATION

CERTIFIED MAIL NO. Z 237 623 490

Koppers Industries, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219

ATTENTION: Donald Sweet
Vice-President

RE: Monessen Coke Plant
Illegal Disposal of Hazardous Waste
Sanitary Landfill, Permit #100277
Westmoreland County

Dear Mr. Sweet:

The Pennsylvania Department of Environmental Resources, Bureau of Waste Management, regulates the disposal of solid waste within the Commonwealth of Pennsylvania pursuant to Act 97, the Pennsylvania Solid Waste Management Act (PSWMA), July 7, 1980, P.L. 380, 35 P.S. §6018.101, et. seq., and the Pennsylvania Solid Waste Management Rules and Regulations Chapter 75 and Sections 271 through 299.

During an inspection of Sanitary Landfill on September 12, 1995, a rolloff box containing contaminated soil and decanter tar sludge, a listed hazardous waste (K087) generated at Koppers Industries' Monessen Coke Plant, attempted to off load at the landfill. Site engineer for the landfill, Don Guerra noticed tar flowing from the bottom of the container box as it was being unloaded and halted the disposal. He promptly notified Koppers personnel of the irregularity. A follow-up inspection of rolloff box #220657 (labeled as non-hazardous) on Kopper's property revealed the top layer of material to consist of rock, brick and dirt. The bottom of the box contained the tar as evidenced by the tar stained liner still protruding from the bottom of the rolloff box. After discussing the situation with plant superintendent, Jim Burkhart and the site environmental manager, Greg Shamitko, it was evident that tighter control/tracking of wastes generated at the plant is needed. Currently, no tracking record is in use which logs in waste as they are generated, characterized (and sampled if necessary), and containerized for storage until final disposition. Regardless of Koppers Industries' intent, transporting hazardous waste without a manifest and attempting to dispose of it in a municipal waste landfill, are violations of Act 97, Sections 403(a), 403(b)(5)(8) and (9), and 610(6) and 610(8)(i).



In order to correct this violation, you should immediately cease disposal of all residual and hazardous waste until an accurate accounting of all wastes on site is accomplished. All containerized wastes should be inspected to insure the contents are properly identified. Finally, container box #220657 holding the K087 hazardous waste, should be relabeled and properly manifested for disposal at a permitted hazardous waste treatment, storage or disposal facility.

As a result of a follow-up inspection of this incident conducted on September 19, 1995, the following violations were observed:

1. Hazardous waste containers were stored without proper containment, specifically five (5) hoppers containing decanter tar sludge (K087) and four (4) 55 gallon drums containing K087 were staged on the ground along the access road adjacent to the Monongahela River. This is a violation of 25 PA Code Chapter 265.178a.
2. A proper waste determination has not yet been completed for the waste oil storage tank (i.e. muck tank oil), cooling tower sludge/tar, and the sump sludge from the tar collecting tanks. This is a violation of 25 PA Code Chapter 262.11 and Section 403(b)(1) of Act 97.
3. Hazardous Waste Management training of employees had not yet been accomplished as cited on the July 26, 1995 inspection. This is a violation of 25 PA Code Chapter 264.16 and Section 403 (b)(11) of Act 97.
4. A preparedness, prevention and contingency (PPC) plan had not yet been developed and implemented. This is a violation of 25 PA Code Chapter 264.51(a).


A reinspection of the facility will be conducted on or about October 30, 1995 to determine if the above listed violations have been corrected.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based, nor shall this letter be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you should have any questions concerning this matter, please feel free to contact me.

Sincerely,


David L. Leford
Waste Management Specialist
Bureau of Waste Management

cc: EPA ✓
Region
County
C. Duritsa
S. Whitsel
B. Musser
Chron

5

cc: Pittsburgh Region
EPA
Facility
Chron

ER-WM-300: Rev. 11/93
Part A

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 19 September 1995 Time start _____ Time finish _____
Name of Inspector David LeFord
Company, installation name Koppers Industries, Inc.
Location 345 Donner Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official Donald Sweet
Title Vice President
Mailing Address 436 Seventh Avenue Pittsburgh, PA 15219
Area code and telephone number (412) 227-2032
Name of person interviewed Gregory Shmitko
Title Director of Environmental Affairs
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087</u>	<u>LWD, Inc. KYD 088 438 812</u>	<u>Calvert City, KY 42029 - ^{hnd} disposal</u>
<u>D001, D003, D004, D010</u>	<u>" " "</u>	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Koppers Industries, Inc. ID Number PAD 982 577 082 Date 19 Sept. 1995

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>				Hazardous waste determination, performed on all waste streams <i>noted</i>	262.11	H001
<input checked="" type="checkbox"/>				Identification number	262.12	H002
<input checked="" type="checkbox"/>				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	<input checked="" type="checkbox"/>			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	<input checked="" type="checkbox"/>			PA manifest used for intrastate shipments	262.20(b)	H005
<input checked="" type="checkbox"/>				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
<input checked="" type="checkbox"/>				Manifests filled out properly and completely	262.20(g)	H007
<input checked="" type="checkbox"/>				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
<input checked="" type="checkbox"/>				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
<input checked="" type="checkbox"/>				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
<input checked="" type="checkbox"/>				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		<input checked="" type="checkbox"/>		Placards offered to transporter	262.33	H012
		<input checked="" type="checkbox"/>		Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
			<input checked="" type="checkbox"/>	Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
			<input checked="" type="checkbox"/>	Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
<input checked="" type="checkbox"/>				a). All containers of haz. waste in good condition	265.171	H016
<input checked="" type="checkbox"/>				b). Containers compatible with hazardous waste being stored within	265.172,	H017
			<input checked="" type="checkbox"/>	c). Containers of hazardous waste kept closed	265.173(a)	H018
			<input checked="" type="checkbox"/>	d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
			<input checked="" type="checkbox"/>	e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		<input checked="" type="checkbox"/>		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		<input checked="" type="checkbox"/>		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
			<input checked="" type="checkbox"/>	h). Proper containment and collection system(s)	265.178	H023
<input checked="" type="checkbox"/>				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
			<input checked="" type="checkbox"/>	On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part 3

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
		X		Records retained at designated location for 20 years	262.40(a)	H026
		X		Quarterly reports submitted to the Department	262.41(a)	H027
	X			Exception reporting procedures followed	262.42	H028
	X			Hazardous waste disposal plan, if required	262.45	H029
	X			Spill reporting procedures followed	262.46(a)	H030
		X		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 <i>Due 2 Oct. 1995</i>	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
		X		Source reduction strategy prepared and available	262.80	H033

INSPECTION REPORT COMMENTS

Inspection of this facility conducted with compliance specialist Bob Musser and site environmental affairs director Greg Shamitko as a follow-up to the mix-up involving attempted disposal of K089 at Sanitary Landfill, #100277 a municipal waste landfill. The roll off box containing K089 (box #220657) has been labeled as hazardous waste. The other two boxes (box #220326 and) will be offloaded and inspected for K089 prior to disposal. All contaminated soils (with K089) should be placed into a separate box and disposed as hazardous waste. The remainder may be disposed of as a residual waste.

All other soils excavated and marked for disposal should be inspected for hazardous materials. Sampling of soils should be performed according to the location the material is generated from. For example, soils excavated from around the coal tar decanter should be stockpiled and sampled/analyzed separately from soils excavated from an oil railroad bed.

Additional sampling/waste determinations that should be performed include the containment sump sludge from the tar collecting tanks adjacent to the coal tar decanter tank (other tank), and the muck tank oil (storage tank #16) which is full.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 19 September 1995 Identification Number PAD 98257082

Company/Facility/Site Name Koppers Industries, Inc.

Besides K087, the only other hazardous waste disposed of was the settling basin sludge (characteristic waste D007, D008, D009, D010). On 23 August 1985 Koppers applied for a new generator's I.D. number. Waste codes applied for include D001, D018, D026, K087, K141, K142, K143, K144, K145.

A new stainless steel tank with two above ground pumps has replaced the old interceptor sump. The interceptor sump is pumped to the ammonia liquor storage tank.

No discharge observed from outfall 001 (formerly 006). This discharge point will include water from the cooling towers, bag plant, and boiler blowdown. The river appeared clear. No oil staining observed.

Violations observed during this inspection include the following:

1. Five hoppers and one steel cylinder stored next to the river (near the old dorr thickener) were not labeled. The steel cylinder and one hopper had leaked K087 onto the ground. These are violations of 25 PA Code 262.34(a)(3), 265.123(c), and Section 610(1) of Act 97.

2. There is no containment area for hazardous waste storage at this time which is a violation of 25 PA Code 265.118. The containers mentioned above as well as four 55 gal. drums of K087 (8/24/95) are stored without containment. Operator states containment area is under construction next to A.K.T. plant.

3. Training of employees has not been accomplished, although class time is scheduled for 28 Sept. through 13 Oct. Training to be performed by Penn State University.

The new PPC plan is due to be submitted by 2 October 1995.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date 19 Sept 1995

Inspector (signature) Daniel J. [Signature]

Date 19 Sept. 1995

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT		Citation
1	2	3	4	40 CFR Part 268			
					Generators		
X					Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X					Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X					Dilution not used as a substitute for treatment.		3
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
					Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
					Containers marked to identify contents and accumulation date.		50(a)(2)
					Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
					Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
					Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
					Treatment Facilities, including PBR and RRR Facilities		
					Dilution not used as a substitute for treatment.		3
					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
					Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
					Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
					Facility retains copies of generator notifications and certifications.		7(c)(1)

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

**EPA**

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

EPA REGION

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)☐

A. First Notification

☒B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

P A D 9 8 2 5 7 7 0 8 2

II. Name of Installation (Include company and specific site name)

K O P P E R S I N D U S T R I E S - M O N E S S E N

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

3 4 5 D O N N E R A V E N U E

Street (continued)

City or Town

M O N E S S E N

State

ZIP Code

P A 1 5 0 6 2 - 0 5 1 0

County Code

County Name

1 2 9 W E S T M O R E L A N D

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

S A M E

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

B U R K H A R T

(first)

J I M

Job Title

P L A N T M A N A G E R

Phone Number (area code and number)

4 1 2 - 6 8 4 - 1 0 0 0

VI. Installation Contact Address (See Instructions)A. Contact Address
Location Mailing☒

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See Instructions)**A. Name of Installation's Legal Owner**

K O P P E R S I N D U S T R I E S I N C

Street, P.O. Box, or Route Number

4 3 6 S E V E N T H A V E N U E

City or Town

State

ZIP Code

P I T T S B U R G H P A 1 5 2 1 9 - 1 8 0 0

Phone Number (area code and number)

4 1 2 - 2 2 7 - 2 0 0 1

B. Land Type

P

C. Owner Type

P

D. Change of Owner

Yes

X

No

(Date Changed)

0 4 2 0 9 5

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See instructions)

- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)

2. Transporter (Indicate Mode in boxes 1-5 below)

- ☐ a. For own waste only
☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify

3. Transfer, Storage, Disposal (at installation)
Note: A permit is required for this activity; see instructions.

4. Hazardous Waste Fuel

- ☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Burner - indicate device(s)
Type of Combustion Device
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace

5. Underground Injection Control

B. Used Oil Fuel Activities

1. Specification Used Oil Fuel

- ☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner - indicate device(s)
Type of Combustion Device
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace

2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. EP Toxic (D000) ☒

(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))

D 0 1 8 D 0 2 6

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 K 0 8 7	2 K 1 4 1	3 K 1 4 2	4 K 1 4 3	5 K 1 4 4	6 K 1 4 5
7	8	9	10	11	12

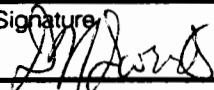
C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature



Name and Official Title (type or print)

D. N. Sweet, Vice President

Date Signed

8/23/95

XI. Comments

Koppers Industries is requesting a new installation EPA ID Number for this facility because of the change in ownership.

OFN: ~~None~~ Monessen Inc

BAH/cz 9/14/95

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

August 23, 1995

U. S. EPA Region III
RCRA Programs Branch
Pennsylvania Section (3 HW51)
841 Chestnut Building
Philadelphia, PA 19107

**CERTIFIED MAIL
RETURN RECEIPT
REQUESTED**

P 857 417 825

Re: Installation EPA ID Number
Monessen Coke Plant
Monessen, PA

RECEIVED
PA/DC SECTION

AUG 29 1995

EPA REGION III

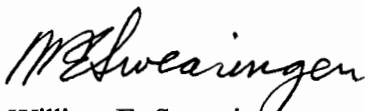
To whom it may concern:

Koppers Industries, Inc. (KII) recently purchased a coke plant that is located in Monessen, Pennsylvania. The former legal owner was Sharon Steel Corporation. Accordingly KII is submitting a Notification of Regulated Waste Activity (Form 8700-12) for this plant.

This plant has not been in active service since September 1991. Maintenance and repair of the coke plant facilities have been on-going since April 20, 1995. Because of the length of inactivity associated with this plant and because of the change in ownership, KII is requesting that a new EPA ID Number be assigned to this installation.

Please call me at (412) 227-2883 if you have any questions concerning this request or need any additional information.

Very truly yours,



William E. Swearingen,
Manager, Environmental Programs

enclosure

cc: Jim Burkhart; Monessen
Gregory Shamitko; Monessen

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region
EPA
ECP
BWQ
Chipp
Facility

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 26 July 1995 Time start 10:00 a.m. Time finish 2:00 p.m.
Name of Inspector David Leiford
Company, installation name Koppers Industries, Inc. Monessen Coke Plant
Location 345 Donner Avenue Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official Donald Sweet
Title vice president
Mailing Address 436 Seventh Avenue Pittsburgh, PA 15219
Area code and telephone number (412) 227-2032
Name of person interviewed James Burkhardt
Title plant manager
Mailing address (if different from above) same
Area code and telephone number (412) 684-1000

1. Current waste handling method:

- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PSR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. not yet determined kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
K082		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 26 July 1995 Identification Number PAC 98257082

Company/Facility/Site Name Koppers Industries Inc. Monessen Coke Plant

Inspection of this facility conducted with Stan White, Scott Swann, and Tom Bishop of the Department and Jim Burkhardt, plant manager.

Construction activities that are on going included the new boiler house access from the desulfurization plant, a concrete pad for the two new titanium ammonia stills to be constructed, a new tar storage tank and containment area for the new coal storage tanks, containment for the 20,000 horizontal storage tanks (two sulfuric acid, one waste oil, one wash oil), a new coal tar decanter, a new ammonium sulfate building.

Niagara coolers are being removed and scheduled to be replaced with new spirals, baghouse for coke breeze is being refurbished, water treatment plant is being cleaned (i.e. sludge basins), and the quench tower is being rebuilt.

Cleanup of coal tar spilled onto the ground (K087) in the vicinity of the old decanter (no. 1) has begun. Currently, two roll off boxes have been filled with this waste. Additional K087 remains on the ground around the old decanter. One roll off box was uncovered which allowed rainwater to accumulate on top of the K087. Both containers need to be labeled to accurately identify their contents. Labeling of all waste containers throughout the coke plant should be accomplished. Additionally, an inventory should be compiled of all wastes that are generated during start-up operations.

Contaminated soils excavated from in and around the interceptor sump remain lying on the ground. This soil is most likely a hazardous waste (benzene) and should be containerized.

A waste determination should be performed on the interceptor sump soils as well as the waste oil tank which has been used to hold water pumped from the interceptor sump and other ~~contaminated~~ contaminated waters/oils.

Training and/or close supervision of workers (both contract and company personnel)

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 26 July 1995 Identification Number PAD 98257082

Company/Facility/Site Name Koppers Industries, Inc. Massena Coke Plant

is needed on the handling of hazardous wastes. While moving to the adjacent property still owned by Chron Steel, a bobcat operator was observed attempting to dump a bucket load ($\approx 1 \text{ yd}^3$) of decanter tar (KOS) onto a pile of soil adjacent to the river. It appeared that several buckets had already been dumped there. This activity was ceased immediately by the plant manager and a cleanup of the material dumped onto the ground filled four, 55 gal. drums.

Violations observed during this inspection are listed below.

1. Illegal disposal of hazardous wastes, specifically decanter tar sludge (KOS) and benzene contaminated soils from the interceptor sump by dumping them onto the ground. This is a violation of 25 PA Code Chapter 262.1(a) and Sections 401(a), 403(b)(9), 501(a) and 610(1) of the Solid Waste Management Act (Act 97).
2. The roll off box container left open to accumulate rainwater is a violation of 25 PA Code Chapter 262.34(a)(3), 265.123(b) and Sections 401(a) and 403(b)(9) of Act 97.
3. Failure to properly label roll off boxes and 55 gallon drums holding hazardous waste is a violation of 25 PA Code Chapter 262.34(a)(2), 265.123(c) and Sections 403(b)(2) and 403(b)(9) of the Solid Waste Management Act.
4. A proper waste determination has not been completed for the waste oil tank contents, interceptor sludge/soil, and cooling tower sludge/tar. This is a violation of 25 PA Code 262.11 and Section 403(b)(1) of Act 97.
5. The failure to maintain/operate the coke plant to minimize the possibility of a discharge of hazardous waste is a violation of 25 PA Code Chapter 265.1. Inadequate training of personnel handling hazardous waste is a violation of Section 403(b)(11).

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Person interviewed (signature) _____ Date _____

Inspector (signature) David L. Lutz Date 31 July 1995

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 26 July 1995 Identification Number PAC 982572082

Company/Facility/Site Name Koppers Industries, Inc., Monessen Coke Plant

A copy of the preparedness, prevention and contingency plan should be submitted to the Department as soon as one is completed for the coke plant.

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Person interviewed (signature) [Signature] Date 26 July 1995

Inspector (signature) [Signature] Date 31 July 1995

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation	
1	2	3	4			40 CFR Part 268	
				Generators			
		X		Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)	
		X		Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)	
		X		Dilution not used as a substitute for treatment.		3	
			X	Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)	
				Storage Facilities			
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)	
				Containers marked to identify contents and accumulation date.		50(a)(2)	
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)	
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)	
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)	
				Treatment Facilities, including PBR and RRR Facilities			
				Dilution not used as a substitute for treatment.		3	
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)	
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)	
				Land Disposal Facilities			
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)	
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40	
				Facility retains copies of generator notifications and certifications.		7(c)(1)	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region
EPA
ECP
BWQ
Chen

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 29 June 1995 Time start 0930 Time finish 1600
Name of Inspector David Leiford
Company, installation name Koppers Industries, Inc. Monessen Coke Plant
Location 345 Donner Avenue Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official Donald Sweet
Title vice president
Mailing Address 436 Seventh Avenue Pittsburgh, PA 15219
Area code and telephone number (412) 227-2032
Name of person interviewed James Burkhardt
Title plant manager
Mailing address (if different from above) same
Area code and telephone number (412) 684-1000

1. Current waste handling method: not determined;
- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

a. not determined kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K082</u>		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 29 June 1995 Identification Number PAF 982 571 082

Company/Facility/Site Name Koppers Industries, Inc. Monessen Coke Plant

Inspection of this facility conducted with Howard Dunn, water quality specialist and Jim Burkhardt, plant manager. Weather was overcast, warm, humid (temp 75°F). The oily discharge from outfall #006 has ceased. Only a trickle discharge was observed from the outfall and did not appear to contain oil, however, an extensive oil sheen on the Monongahela River exists along the riverbank for several hundred yards. The source of the oil sheen was not readily discernible. Some oil was observed rising to the water surface in the coal loading/barge dock area. Samples of the oil sheen were taken by specialist Dunn to determine the nature of the oil.

In an attempt to abate the violation cited on 6/13/95 the following actions have been taken. An absorbent boom has been placed on the river to contain oil discharged from outfall #006. Absorbent pads have been placed in flume of the outfall. The manholes for the sewer drains leading to outfall #006 are in the process of being filled with concrete. Two manholes have been backfilled before. It is Koppers' intent to eliminate all sources of water to outfall #006 with the exception of the new (not yet installed) 6 inch discharge line from outfall #106 (ie "bug plant"). At this time, the notice of violation has been abated, although the source of contamination has not been eliminated as yet.

Various demolition and construction projects are ongoing to ready the plant for coke production (estimated for September 30, 1995). The following observations were made on a walk through of the plant.

- BOF plant demolition has not yet been completed. Anticipated to be resumed after 4th of July.
- excavation material (mostly brick) for the boiler house is being temporarily

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 29 June 1995 Identification Number PAD98257082

Company/Facility/Site Name Koppers Industries, Inc. Monessen Coke Plant
stored on a concrete pad where the boiler had been located. Material is to reused on site as fill material during construction of the new boiler house. The old sulfate process building (brick) was dumped into the old dorr thickener. Operator should note that demolition debris is not considered clean fill. Any future demolition debris that is to be disposed of should be landfilled.

- baghouse inlet/outlet plenum is being refitted. old filters have been stacked in a roll off box and on the ground.
- draft stacks for 1B and 2B coke batteries are being refitted.
- hydraulic fluid drums next to excavation for the new boiler house are leaking onto the ground. Drums should be drained into good containers. Oil soaked ground is a residual waste which must be disposed of in a permitted landfill.

Solid wastes which require a waste determination (analysis) prior to disposal include (but not limited to):

- 1) baghouse filters
- 2) cooling tower sludge (6+ inches)
- 3) seal sump for the bleeder stack
- 4) equalization basins sludge
- 5) sludge from the interceptor sump. This material should be handled as a hazardous waste based on previous sample results - high benzene content.

Note: Not all asbestos has been removed from pipelines located within the coke plant as stated in Mr. Swearingen's letter to the Department dated May 18, 1995. Several pipelines adjacent to the water treatment plant remain insulated with asbestos-containing material.

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Person interviewed (signature) [Signature]

Date 6-29-95

Inspector (signature) [Signature]

Date 29 June 1995

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region
EPA
Facility
WCIDC

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 14 March 1985 Time start _____ Time finish _____
Name of Inspector David Leiford
Company, installation name Monessen, Inc
Location 345 Donner Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAID 982 57 082
Name of responsible official B. James Burkhardt
Title Superintendent
Mailing Address P.O. Box 270 Sharon, PA 16146
Area code and telephone number (412) 684-1005
Name of person interviewed none
Title _____
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method: none

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal ☐ reclaim
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. not yet determined kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087</u>		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 14 March 1995 Identification Number PAD 982 577 082

Company/Facility/Site Name Monessen, Inc.

Inspection of facility conducted with Lynn Stawalter, of Westmoreland County Industrial Development Corporation and Alan Halperin, geologist with DiAppolonia Engineering. The following observations were made:

An oil sheen was observed on the Monongahela River in the area of outfall #006. A trickle discharge was occurring from the outfall pipe.

Undocumented barrels in the container identification process that were observed include: one black 55 gal drum on the upstream end of the open hearth facility (also found were a 30 gal gasoline tank partially full and a large truck battery); three rusted 55 gal drums on the overhead walkway across from the scrubbers for Blast Furnace #2; one 55 gal drum of grease (1/3 full) in the control room for the coke conveyor across from Blast Furnace #2; a 1,500-2,000 gal. vertical tank across from the stores for Blast Furnace #1; several 5 gal. containers of Eagle Calvanizer, a compressed refrigerant tank, and a 500 gal. tank in the basement of the engine house (across from Ninth St.), all need to be included on the waste inventory. The only questionable items (products?) were the containers found inside the engine house.

Two fiberboard containers (labeled CEN 105) were observed on their side spilling the contents onto the ground (iron spiral packing). This should be cleaned up.

Drum BF142-7 containing waste oil has leaked onto the ground. It appears the majority of the listed 40 gallons of oil has spilled out. All ground contaminated with this oil and other leaking drum containers must be cleaned up and disposed with the drums when the drum management/disposal plan is approved.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature]

Date 4 April 1995

Inspector (signature) [Signature]

Date 4 April 1995